

# DAIMLER

Daimler AG • 71059 Sindelfingen

Mr. Chris Nevers  
Environmental Protection Agency  
Certification and Compliance Division  
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USA

Ihre Zeichen, Ihre Nachricht vom  
Your reference

Unser Zeichen, unsere Nachricht vom  
Our reference

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Name Holger Kunz		Datum/Date 03/03/2011

## Request for Usage of LDT Additive Adjustment Factors (AAF) for LDV

Dear Mr. Nevers.

Mercedes-Benz intends to apply the existing and already certified AAF's for Diesel LDT's to Diesel LDV's.

The AAF is a factor which represents cyclic regenerations, i.e. the regeneration of the Diesel Particulate Filter (DPF) as used in our BLUETEC Diesel vehicles. The AAF is added (for each emission component) to the result of the certification emission tests. The procedure itself was approved by EPA in CY2005.

For MY12 Mercedes-Benz will certify the following BLUETEC models:

Durability Group	DDV	GS	Test Group	Model Name	Exh. Use
CMBXDPDNNPP3	L906-1057-L906DE30TC (5,0t)	4,6	CMBXT03.0HD2	Sprinter 3500 CDI/Freight	EDV
CMBXDPDNNPP1	X164-889-X164D30TC_c/o	4,5	CMBXT03.0U2B	GL 350 BLUETEC 4MATIC	EDV
		3,5	CMBXV03.0U2B	R 350 BLUETEC 4MATIC	FEDV
CMBXDPDNNPP2	L906-1056-L906DE30TC (4,53t)	4,6	CMBXT03.0HD1	E 350 BLUETEC	EDV
		4,6	CMBXT03.0U2A	Sprinter 3500 CDI/Freight	DDV
		4,5	CMBXT03.0U2A	Sprinter 2500 CDI/Freight	
		5,5	CMBXV03.0U2A	M 350 BLUETEC 4 MATIC	EDV
				S 350 BLUETEC 4MATIC	EDV

Therefore:

- the deterioration factors for GL350 BLUETEC 4MATIC, R350 BLUETEC 4MATIC and E350 BLUETEC 4MATIC derive from durability group CMBXDPDNNPP1 (X164-889 = GL BLUETEC)

REVIEWED AND ACCEPTED,

DATE 6-16-2011 EPA REP [Signature]

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- the deterioration factors for M350 BLUETEC 4MATIC and S350 BLUETEC 4MATIC derive from durability group CMBXDPONNPP2 (L906-1056 = Sprinter)

The models belong to the following vehicle classes:

MY	MB model	Veh. Class
		EPA
2012	S 350 BLUETEC 4MATIC	LDV
2012	E 350 BLUETEC	LDV
2012	R 350 BLUETEC 4MATIC	LDT 4
2012	GL 350 BLUETEC 4MATIC	LDT 4
2012	M 350 BLUETEC 4 MATIC	LDT 3
2012	Sprinter 2500 CDI/Freight	HDV
2012	Sprinter 3500 CDI/Freight	HDV

As the Sprinter model is a HDV whereas all other BLUETEC models are LDVs and LDTs, Mercedes-Benz does not regard Sprinter AAF as a representative AAF for LDV/LDT. Rather Mercedes-Benz intends to apply the AAF which derives from the GL350 BLUETEC 4MATIC to all other BLUETEC LDT/LDV.

Mercedes-Benz gives the following evidence to support its evaluation:

The AAF value mainly depends on the vehicle weight (respect. ETW) and power (hp):

Model Year	MB Vehicle Code (covered veh.)	Exhaust Emission Control System	Displ.	Horse Power	RPM (HP_max)	ETW
2012	S 350 BLUETEC 4MATIC	DDI/TC/CAC/EGR/OC/PTOX/SCR-U/NOS(2)/HAFS	2987	240	3600	5000
2012	M 350 BLUETEC 4 MATIC	DDI/TC/CAC/EGR/OC/PTOX/SCR-U/NOS(2)/HAFS	2987	240	3600	5500
2012	E 350 BLUETEC	DDI/TC/CAC/EGR/OC/PTOX/SCR-U/NOS(2)/HAFS	2987	210	3400	4500
2012	R 350 BLUETEC 4MATIC	DDI/TC/CAC/EGR/OC/PTOX/SCR-U/NOS(2)/HAFS	2987	210	3400	5500
2012	GL 350 BLUETEC 4MATIC	DDI/TC/CAC/EGR/OC/PTOX/SCR-U/NOS(2)/HAFS	2987	210	3400	6000
2012	Sprinter 2500 CDI/Freight	DDI/TC/CAC/EGR/OC/PTOX/SCR-U/NOS(2)/HAFS	2987	188	3600	8500
2012	Sprinter 3500 CDI/Freight	DDI/TC/CAC/EGR/OC/PTOX/SCR-U/NOS(2)/HAFS	2987	188	3600	10500

The GL model is the LDT with the highest ETW at lowest engine power (in LDT/LDV class). Therefore it has to be regarded as worst case for generating an AAF for the LDT and LDV class. Applying a Sprinter (HDV) AAF to a LDV is not found reasonable due to the big difference in ETW.

Your approval will be highly appreciated.

Sincerely

Markus Loesch

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Fahrzeuge und Motoren

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